

FACILITY INSPECTION PLAN

US ECOLOGY NEVADA

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SECTION 5
FACILITY INSPECTION PLAN
TABLE OF CONTENTS

5.1.0	General Inspection Requirements.....	1
5.1.1	Types of Problems.....	1
5.1.2	Frequency of Inspections.....	1
5.2.0	Unit Specific Inspection Requirements.....	2
5.2.1	Container Management Unit Inspections [40 CFR § 264.174]	2
5.2.2	Tank System Inspections [40 CFR §264.195].....	2
5.2.2.1	Tank System External Corrosion and Releases.....	3
5.2.2.2	Tank System Construction Materials and Surrounding Area	3
5.2.2.3	Tank System Overfill Control Equipment.....	3
5.2.2.4	Tank System Monitoring and Leak Detection Equipment	3
5.2.2.5	Tank System Cathodic Protection.....	4
5.2.2.6	Additional Tank System Inspection.....	4
5.2.3	Surface Impoundment Inspection [40 CFR §264.226].....	4
5.2.4	Waste Pile Inspection [40 CFR §264.226].....	4
5.2.5	Land Treatment Inspection [40 CFR §264.278].....	4
5.2.6	Landfill Inspection [40 CFR §264.303].....	4
5.2.6.1	Run-on and Run-off Control System.....	4
5.2.6.2	Wind Dispersal Control.....	5
5.2.6.3	Leachate Collection and Removal System.....	5
5.2.7	Incinerator Inspection [40 CFR §264.347].....	5
5.2.8	Security, Safety & Emergency Response Equipment.....	5
5.2.9	Monitoring Well Inspections	5

APPENDICES

Appendix 5 A Daily Facility Inspection Reports

INSPECTION PLAN

This Inspection Plan outlines the schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that prevent, detect, or respond to environmental or human health hazards in accordance with 40 CFR §§270.14(b)(5), and 264.15, and 264.33. The chapter also addresses specific inspection areas in detail and contains examples of the inspection forms used at the facility. Table 1 outlines inspection frequencies for each area of the facility.

5.1.0 General Inspection Requirements

The following paragraphs identify facility equipment and operating areas, identify potential problems, and outline measures to prevent the occurrence of these problems. A copy of the completed inspection forms and the inspection schedule are kept at the facility at least three (3) years from the date of inspection.

The format of the inspection forms may be modified from time to time to address ongoing inspection assignments. Changes to the inspection format do not require Nevada Department of Environmental Protection (NvDEP) notification or a permit modification since the content of the inspection forms/procedures or the minimum inspection frequency will not be altered. Content of inspection forms may be changed through a Class 1 permit modification. Additionally, non-RCRA required inspections might be added and removed from time to time for convenience.

5.1.1 Types of Problems

Regular inspections are conducted to identify equipment malfunctions, structural deterioration, operator errors, uncontrolled run-off, leachate generation, or other discharges that could cause or lead to the release of hazardous waste constituents or that would threaten human health or the environment. Inspections are intended to detect potential problems in time to correct them before they result in a release of hazardous waste constituents and/or cause harm to human health or the environment.

Appendix A presents the schedule of routine inspections for the various components/units critical to the proper operation of the facility. Specific inspection items and potential problems associated with each inspection area are referenced in the following paragraphs as well as on each individual inspection form.

5.1.2 Frequency of Inspections

The facility's inspection schedule was developed based on applicable regulatory requirements, estimated rate of potential equipment deterioration, and the probability of an environmental or human health incident if any equipment deterioration, malfunction or operator error were to go undetected between inspections. Table 1 identifies the inspection frequency for each of the various facility components/units. The frequency of the scheduled inspections is based on a probability of an occurrence of an incident or malfunctions and is designed to minimize the need to implement the facility's Contingency Plan. In addition to the daily inspections all permitted units are inspected weekly by facility management or their designee and documented on a weekly inspection form. Daily and weekly inspections forms are included in Appendix A.

All facility units in which waste is actively being handled are under surveillance for spills, malfunctions, and operator error during active operations. The activities discussed in the following paragraphs are more formal, documented procedures to support and verify these operational inspections.

In all active waste handling areas, a daily inspection is performed when the area is in use (i.e.; each operating day). Other areas are subject to weekly or monthly inspections.

For specified areas, identified in Table 1, inspections are also performed after storm events of 0.25" of precipitation in 24 hours.

In accordance with 40 CFR §264.15, any deterioration or malfunction of equipment or structures that could cause or lead to the release of hazardous waste constituents or threaten the environment or human health will be corrected utilizing interim and final corrective measures. Where a hazard is imminent or has already occurred, action is taken expeditiously. Response actions for contingency procedures are provided in detail in the Contingency Plan.

5.2.0 Unit Specific Inspection Requirements

5.2.1 Container Management Unit Inspections [40 CFR §264.174]

At least weekly, areas where containers are stored are inspected for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. If any of these conditions exist, corrective activities are instituted to clean up and limit the spread of material, and/or restore the integrity of the container or containment system. The CMUs and their associated containment systems are also visually inspected for the presence of cracks and gaps that could result in loss of containment effectiveness, where appropriate. Should structural problems occur that would allow leakage out of the unit or between compatibility segregation areas, or that may develop into a major failure, repair activity will be initiated. CMU #1 and #7 are inspected for proper drainage controls. During scheduled inspections, the CMUs and their associated waste staging loading and unloading areas are visually inspected to determine that adequate aisle space is maintained. Individual containers are also randomly inspected to ensure proper segregation is being maintained. Individual containers in the CMUs, subject to Subpart CC requirements, are inspected for Level 1 compliance.

The CMUs (including containment systems) are inspected for the presence of liquids/solids. Spilled solids are removed in accordance with the requirements of the Contingency Plan, if necessary, and the residues managed in accordance with the Waste Analysis Plan. Liquids discovered in the collection trenches on the truck unloading areas are removed within 48 hours of discovery or within 48 hours of cessation of the rain event. If necessary, absorbent materials are utilized to absorb standing liquid for proper disposal.

5.2.2 Tank System Inspections [40 CFR §264.195]

The following items must be inspected at least once each operating day:

- (1) Any aboveground portions of the tank system to detect corrosion or releases of waste;
- (2) The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g.; dikes) to detect erosion or signs of releases of hazardous waste (e.g.; wet spots, dead vegetation).

In addition, cathodic protection systems, if present, must be inspected according to the following schedule to ensure they are functioning properly:

- (1) the proper operation of the cathodic protection system must be confirmed within six (6) months after initial installation and annually thereafter; and
- (2) all sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e.; every other month).

Tank systems must also be inspected for the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours, or at the earliest practicable time. Spilled or leaked waste and accumulated precipitation must be removed from the secondary containment system within 24 hours, or in as timely a manner as is possible to prevent harm to human health and the environment. Additionally, aboveground piping (exclusive of flanges, joints, valves, and other connections); welded flanges, welded joints, and welded connections; seal-less or magnetic coupling pumps and seal-less valves; and pressurized aboveground piping systems which do not have secondary containment must be visually inspected daily when in operation.

5.2.2.1 Tank System External Corrosion and Releases

All permitted hazardous waste tanks, piping, valves, and connections are visually inspected for signs of leakage, corrosion, or structural deterioration.

5.2.2.2 Tank System Construction Materials and Surrounding Area

The area immediately surrounding the externally accessible portion of the tanks, including the secondary containment, is visually inspected to detect any erosion or releases.

5.2.2.3 Tank System Overfill Control Equipment

With the exception of the PCB Storage Tanks (T4-T8) all tanks rely on visual inspections to make certain the tanks are not overfilled. All 5 stabilization tanks rely on the equipment operators to monitor the tanks through out the day to ensure the tanks do not overflow. In these tanks waste is treated in batches as to minimize the risk of overflow. The leachate tank (T-15) and evaporation tank (T-11) are visually inspected daily to prevent overflow. If the tanks are near capacity no additional liquids will be added. The PCB storage tanks are equipped with high level alarms to indicate when the tanks are nearing capacity. The alarms are tested daily using the control panel

located inside the office of the PCB building. When testing the alarms if the red indicator light comes on the alarm is working correctly.

5.2.2.4 Tank System Monitoring and Leak Detection Equipment

All tanks and piping are aboveground and are visually inspected each operating day for spills, leaks and accumulated precipitation.

5.2.2.5 Tank System Cathodic Protection

Cathodic protection systems are installed on Stabilization Tanks #1, #2, and #3 and are visually inspected for excessive deterioration bimonthly. USEN welds sacrificial cathodes to the inside to the stabilizations tanks (T1-T3) to prevent steel deterioration. A sacrificial anode is used in cathodic protection where it is intended to be dissolved to protect other metallic components. The more active metal is more easily oxidized than the protected metal and corrodes first. The cathode must oxidize nearly completely before the less active metal will corrode, thus acting as a barrier against corrosion for the protected metal. On a bimonthly basis the inspector visually inspects the cathode for deterioration. Once the cathode deteriorates to approximately 50% of its original size it is replaced.

5.2.2.6 Additional Tank System Inspection

The structural condition of the tanks and their associated piping are visually inspected monthly.

5.2.3 Surface Impoundment Inspection [40 CFR §264.226]

Not Applicable. The facility does not have any hazardous waste surface impoundments.

5.2.4 Waste Pile Inspection [40 CFR §264.254]

Not Applicable. The facility does not have any hazardous waste piles.

5.2.5 Land Treatment Inspection [40 CFR §264.278]

Not Applicable. The facility does not have any hazardous waste land treatment units.

5.2.6 Landfill Inspection [40 CFR §264.303]

While landfills are in operation, they must be inspected weekly and after storms to detect evidence of any of the following:

- (1) deterioration, malfunctions, or improper operation of run-on and run-off control systems;
- (2) proper functioning of wind dispersal control systems, where present; and
- (3) the presence of leachate in and proper functioning of leachate collection and removal systems, where present

Where leak detection systems are present, the amount of liquids removed from each leak detection system sump must be recorded during the active life and closure period. After the final cover is installed, the amount of liquids removed must be recorded at least monthly. If the liquid level stays below the pump operating level¹ for two (2) consecutive months, the amount of liquids must be recorded at least quarterly. If the liquid level stays below the pump operating level for two (2) consecutive quarters, the amount of liquids must be recorded at least semi-annually. If at any time during the post-closure care period the pump operating level is exceeded on a quarterly or semi-annual recording schedule, recording must return to monthly recording until the liquid level again stays below the pump operating level for two (2) consecutive months.

5.2.6.1 Run-On and Run-Off Control System

During landfill inspections, the landfill run-on/run-off control systems are inspected for evidence of deterioration, malfunction, or improper operation. Particular attention is given to the integrity of containment dikes (where present) and to any blockage of the drainage channels, swales, culverts, and other drainage structures.

5.2.6.2 Wind Dispersal Control System

Wind dispersal/dust control measures at the facility are inspected for adequacy and effectiveness. This activity includes both a visual inspection and determination of whether the condition of any exposed hazardous waste is a wind dispersal issue.

5.2.6.3 Leachate Collection and Removal System

Leachate collection and removal systems (LCRS) and secondary leak detection, collection, and removal systems (LDCRS) of Landfill Cells are inspected for the presence of liquids. In the event the quantity of liquid detected in the LDCRS exceeds the Allowable Leakage Rate, then the procedures defined in the Response Action Plan (RAP) will be implemented. The RAP for Trench 11 and Trench 12 can be found in Appendix 11-B and 11-C respectively.

5.2.7 Incinerator Inspection [40 CFR §264.347]

Not Applicable. The facility does not have any hazardous waste incinerators.

5.2.8 Security, Safety & Emergency Response Equipment

Security fences and gates and safety and emergency response equipment listed in the Contingency Plan are inspected monthly to ensure the equipment is operable and available, as appropriate.

5.2.9 Monitoring Well Inspections

Wells are inspected to verify they are locked, undamaged, and free from apparent tampering on a quarterly basis.

¹ "Pump operating level" is a liquid level based on pump activation level, sump dimensions, and level that avoids backup into the drainage layer and minimizes head in the sump.

Table 1

FACILITY INSPECTION SCHEDULE

US Ecology Nevada
TABLE 1 – INSPECTION SCHEDULE

Unit	Location/Description	Frequency	Form
CMU #1	PCB/RCRA Building	Daily	PCB Building
CMU #6	Dry Hazardous Waste Storage Area #2 (DHWSA #2)	Daily	DHWSA #2
CMU #7	Bin Storage Area (Secondary containment)	Daily	Truck Parking Area
CMU #8	Lab Waste Storage Area	Weekly	Lab Waste Water Accumulation Containers
CMU #16	Container Management and Stabilization Building	Daily	Container Management and Stabilization Building
CMU #17	Dry Hazardous Waste Storage Area #3	Daily	DHWSA #3
Tank #1	Stabilization Tank (Pan 1)	Daily	Batch Stabilization Tank
Tank #2	Stabilization Tank (Pan 2)	Daily	Batch Stabilization Tank
Tank #3	Stabilization Tank (Pan 3)	Daily	Batch Stabilization Tank
Tank #4	PCB Storage	Daily	PCB Processing and Storage
Tank #5	PCB Storage	Daily	PCB Processing and Storage
Tank #6	PCB Storage	Daily	PCB Processing and Storage
Tank #7	PCB Storage	Daily	PCB Processing and Storage
Tank #8	PCB Storage	Daily	PCB Processing and Storage
Tank #9	PCB Storage (Reserved)	NA	NA
Tank #10	PCB Storage (Reserved)	NA	NA
Tank #11	Evaporation Tank	Daily	Daily Facility (Evaporation Pad)
Tank #18	Stabilization Tank (Pan 4)	Daily	NA
Tank #19	Stabilization Tank (Pan 5)	Daily	NA
NA	Landfill	Daily	Daily Landfill Inspection
NA	Closed Cells	Weekly	Weekly Inspection
NA	Two-way Radios and Claxon Horn System	Weekly	Weekly Inspection
NA	Portable Water Tank	Weekly	Weekly Inspection
NA	Truck Parking Area	Weekly	Weekly Inspection
NA	Safety Shed/Unloading Dock Inventory	Weekly	Weekly Inspection
NA	Security Fence and Warning Signs	Weekly	Weekly Inspection
NA	Dry Hazardous Waste Storage Area	Weekly	Weekly Inspection
NA	Various Safety Shower /Eyewash equipment	Weekly	Weekly Inspection

NA	Fire Hydrant/Fire Hose	Monthly	Monthly Fire Hydrant/Fire Hose Inspection
NA	First-Aid Kits	Monthly	Monthly First-Aid Inspection
NA	Full Face Respirator	Monthly	Monthly Full Face Respirator Inspection
NA	Emergency Respiratory Equipment	Monthly	Emergency Respiratory Equipment
NA	Spill Control Equipment	Monthly	Monthly Spill Control Equipment Inspection
NA	General Safety and Tool/Equipment	Monthly	Monthly Safety & Equipment Inspection
NA	Fire Extinguishers	Monthly	Monthly Fire Extinguisher Inspection
NA	Impressed Current/Cathodic Protection System	Bi-monthly	Stabilization Impressed Current Inspection & Test on Cathodic Protection System
NA	SWPPP Inspection (Storm Water Pollution Prevention Plan)	Quarterly	SWPPP Quarterly Inspection
NA	Annual Pollution Plan Inspection	Annual	Beatty Annual Pollution Plan Inspection Report



APPENDIX A

DAILY AND WEEKLY FACILITY INSPECTION REPORTS

DAILY ACTIVE DISPOSAL CELL 11 and UNBURIED WASTE INSPECTION REPORT

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

ACTIVE DISPOSAL CELL 11: Inspect active disposal trench for the following:	Satisfactory	Unsatisfactory
Daily cover for erosion, wind dispersal		
Standing water present		
All drums and bulk materials covered properly		
Dust emissions		
Safety and fire control equipment readily available		
Equipment utilized during unloading is stored inside the disposal area during non-working hours		
**Signs of spillage/litter at unloading dock (when in service)		
Signs of tears/damage to synthetic liners		
Compatibility cells (A & B) are clearly marked		
UNBURIED WASTE:		
Signs of materials leakage		
AFTER STORM EVENT INSPECTION: (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2)		
Inspect landfill above grade dikes for signs of instability or erosion		
Inspect the daily cover applied for wind dispersal control for erosion and areas with exposed waste		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency and Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

BEATTY

CMU #7 DAILY INSPECTION

Truck Parking Pad Area

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

TRUCK PARKING AREA	Satisfactory	Unsatisfactory
Inspect for signs of damage, leakage or fugitive odors from trailers/containers		
Inspect for liquids in TPP Area		
Inspect loading / unloading areas for presence of spillage		
Stored containers are closed		
Containers properly labeled		
Adequate aisle space maintained		
TPP total volume of waste stored does not exceed 20 roll-offs or a cumulative volume of 400 cu yd		
Containers are stored within indicated boundaries		
If >500 VOC - are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
Drainage controls in place (Slide gates in place), pad is in good working condition, etc.		
Unloading dock structurally sound		
Signs of spillage/litter at unloading dock		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency and Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

** 40 CFR Part 264.1086 (c)

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

BEATTY

TANKS T-1, T-2 & T-3 DAILY INSPECTION

Treatment Pans 1, 2 & 3

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

BATCH STABILIZATION TANK	Satisfactory	Unsatisfactory
Inspect treatment pans for excessive damage that might cause unit failure		
Inspect unit's secondary containment for the presence of liquids		
Inspect surrounding area for presence of spillage/odor		
Ensure good general housekeeping is maintained		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

BEATTY

CMU #6 DAILY INSPECTION

Dry Hazardous Waste Storage Area #2

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected. And submit completed form to the Compliance department.

DRY HAZARDOUS WASTE STORAGE AREA II	Satisfactory	Unsatisfactory
Inspect for liquids and / or standing water in DHWSA II		
Inspect loading / unloading areas for presence of spillage		
Adequate aisle space maintained and area properly marked and roped		
Stored containers are DOT approved, closed and / or tarped		
Wastes excluded by Permit condition 3.4.4 (Liquids, PCBs, F020, F021, F022, F026) are not present		
Containers properly labeled		
If >500 VOC – are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
Total Volume of Waste stored does not exceed 840 cu yd (approximately 42 20-yd roll-offs)		
Inspect empty roll-off bins / containers to verify that they do not contain any residue waste and meet the definition of "RCRA empty" (40 CFR 261.7) and labels are removed.		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report form".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

** 40 CFR Part 264.1086 (c)

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

DAILY FACILITY HOUSEKEEPING and EVAPORATION PAD (Tank T-11) INSPECTION REPORT

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

FACILITY HOUSEKEEPING	Satisfactory	Unsatisfactory
Overall facility appearance		
Trash on site or other signs of un-orderly facility maintenance		
Evaluate dust condition of facility roadways		
Miscellaneous tools are stored in an orderly fashion		
EVAPORATION PAD		
Cracks or signs of deterioration (inspect if unit is empty)		
Presence of spills on pad		
General housekeeping in the area		
Inspect secondary containment for presence of liquids (if present, depth = _____ inches)		
Ensure that a minimum of six-inch freeload is maintained		
Maintenance Area		
Check integrity of gasoline, diesel and used oil tanks. Verify tanks and hoses connected to tanks are not leaking.		
AFTER STORMS INSPECTIONS (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2))		
Amount of Rainfall recorded: _____ inches		
Ensure proper functioning of leachate collection and removal systems		
Inspect landfill run-off control ditches to ensure they are not obstructed by the presence of sediment or debris		
Inspect landfill above grade dikes for signs of instability or erosion		
Inspect the daily cover applied for wind dispersal control for erosion and areas with exposed waste		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report form".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date complete, and individual performing corrective action.

CMU #17 DAILY INSPECTION

Dry Hazardous Waste Storage Area #3

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

DRY HAZARDOUS WASTE STORAGE AREA 3	Satisfactory	Unsatisfactory
Inspect for liquids and / or Standing Water in DHWSA 3. If recent rain event check tarps for standing liquids.		
Inspect all areas for presence of spillage / waste on the ground		
Adequate aisle space maintained (3 feet)		
Stored containers are DOT approved, closed and / or tarped		
Wastes excluded by Permit condition 3.4.4 (Liquids, PCBs, F020, F021, F022, F026) are not present		
Containers properly labeled		
If >500 VOC – are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
Total volume of waste stored does not exceed 3,438 cu yd (Approx. 172 20-yd roll-offs)		
Inspect empty roll-off bins / containers to verify that they do not contain any residue waste and meet the definition of "RCRA empty" (40 CFR 261.7).		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

** 40 CFR Part 264.1086 I

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

BEATTY

CMU #1, Tanks T-4, T-5, T-6, T-7 and T-8 Daily Inspection

PCB Building

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

INSPECTED ITEMS	SATISFACTORY	
	YES	NO
PCB PROCESSING AND STORAGE: Audible Alarms (insure working order)		
Storage Tanks (corrosion, erosion or leaks)		
Valves, lines, and fittings (corrosion, erosion or leaks)		
PCB processing: Storage Area (signs of spills, leaks, deteriorated/damaged containers)		
PCB Items, articles, and containers in storage are properly labeled and identified.		
PCB containers in storage are within seven months of their accumulation start date		
RCRA STORAGE : RCRA container storage (signs of leaks, spills, damaged/deteriorated containers, open containers in storage)		
RCRA waste in storage is compatible with stored PCB waste		
RCRA containers in storage are properly labeled, marked, and identified		
RCRA containers in storage are within seven months of their accumulation start date		
GENERAL : General Housekeeping (trash, debris, etc.)		
Run-on/Run-off controls (dikes, berms sloughing or erosion)		
Concrete flooring and containment for expansion cracks, corrosion and other signs of deterioration		
Safety equipment present in proper working condition and properly stored. Chains on walkways on PCB storage tanks in 'closed' position.		
RCRA/PCB containers palletized and stored with a minimum three foot aisle space		
Emergency shower/eyewash functional		
If >500 VOC – are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
AFTER STORMS INSPECTIONS (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2)		
Inspect tank containment for standing liquid or erosion		
FLOOR CONDITION (40 CFR Part 761)		
The epoxy coating is in tact and in good condition		
The colored undercoat is not exposed		
There is no evidence of spills and/or contamination		
The floor/building is maintained in a clean and orderly manner		

*Any items which have determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is taken: include action taken, date completed and name of individual taking the action.

** 40 CFR Part 264.1086 (c)

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

BEATTY

CMU #16, Tanks T-18 and T-19 Daily Inspection

Container Management and Stabilization Building

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

INSPECTED ITEMS

STABILIZATION TANKS	SAT	UNSAT
Inspect tank for excessive damage that might cause unit failure		
Inspect unit's secondary containment for the presence of liquids		
Inspect surrounding area for presence of spillage/odor		
Ensure good housekeeping is maintained		

BUILDING/AUXILIARY EQUIPMENT

Reagent Storage System (corrosion, erosion or leaks)		
Valves, lines, and fittings (corrosion, erosion or leaks)		

CONTAINER STORAGE AREA

Signs of leaks and spills		
All containers in storage are properly labeled, marked, and identified		
All containers stored with a minimum two foot aisle space		
All containers are closed and in good condition		

Temporary Dock

Signs of spillage/litter at portable ramp/dock		
Insure safety rails are secure		
Cleanliness around dock (stains, spills, trash, debris, etc.)		
Other		

GENERAL

General Housekeeping (trash, debris, etc.)		
Concrete flooring and containment-expansion cracks, corrosion or other signs of deterioration		
All required safety equipment present in proper working condition and properly stored.		
Emergency shower/eyewash functional		
Control room is clean & well maintained		
Unloading dock structurally sound		

*Any items which have determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is taken: include action taken, date completed and name of individual taking the action.

BEATTY

DAILY ACTIVE DISPOSAL CELL 12 and UNBURIED WASTE INSPECTION REPORT

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

ACTIVE DISPOSAL CELL 12: Inspect active disposal trench for the following:	Satisfactory	Unsatisfactory
Daily cover for erosion, wind dispersal		
Standing water present		
All drums and bulk materials covered properly		
Dust emissions		
Safety and fire control equipment readily available		
Equipment utilized during unloading is stored inside the disposal area during non-working hours		
**Signs of spillage/litter at unloading dock (when in service)		
Signs of tears/damage to synthetic liners		
Compatibility cells (A & B) are clearly marked		
UNBURIED WASTE:		
Signs of materials leakage		
AFTER STORM EVENT INSPECTION: (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2)		
Inspect landfill above grade dikes for signs of instability or erosion		
Inspect the daily cover applied for wind dispersal control for erosion and areas with exposed waste		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency and Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

BEATTY
WEEKLY FACILITY INSPECTION REPORT

DATE: _____

TIME: _____

EMPLOYEE PERFORMING INSPECTION: _____

A Weekly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection. Please check satisfactory or unsatisfactory for each item inspected.

LANDFILL- CELL 11	<i>Sat.</i>	<i>Unsat.</i>	TRUCK PARKING PAD	<i>Sat.</i>	<i>Unsat.</i>
Inspect run-on control ditches for signs of erosion or sand, silt, or other deposits which might impede storm water flow.			Inspect for signs of damaged or leaking drums.		
Inspect run-off control mechanisms to ensure proper performance, ie: Inspect above-grade dikes for signs of instability erosion, or other problems and ensure waste placement elevations are maintained at a minimum of one foot below crest elevation.			Inspect all containers for proper labeling.		
Inspect leak detection/collection system for presence of leachate.			Remove any accumulated liquid.		
Inspect wind dispersal control systems for proper functioning.			Inspect for sign of spillage on pad.		
LANDFILL- CELL 12	<i>Sat.</i>	<i>Unsat.</i>			
Inspect run-on control ditches for signs of erosion or sand, silt, or other deposits which might impede storm water flow.			LAB WASTE WATER ACCUMULATION CONTAINERS	<i>Sat.</i>	<i>Unsat.</i>
Inspect run-off control mechanisms to ensure proper performance, ie: Inspect above-grade dikes for signs of instability erosion, or other problems and ensure waste placement elevations are maintained at a minimum of one foot below crest elevation.			Ensure proper functioning of overfill control equipment.		
Inspect leak detection/collection system for presence of Leachate.			Inspect all piping for evidence of damage or leakage.		
Inspect wind dispersal control systems for proper functioning.			Inspect accumulation container for signs of leakage / check accumulation start date.		
Ensure emergency response radios are operational and readily available.			Inspect containment structure for presence of spills, standing liquid and signs of cracks or other damage.		
Test Claxon warning system			Perform a lab eyewash alarm test		
PORTABLE WATER TANK	<i>Sat.</i>	<i>Unsat.</i>	SAFETY SHED/TRENCH 12	<i>Sat.</i>	<i>Unsat.</i>
Ensure the water truck is full and available for fire control.			Ensure that safety and fire control equipment is readily available.		

SECURITY FENCE AND WARNING SIGNS	<i>Sat.</i>	<i>Unsat.</i>	CLOSED CELLS	<i>Sat.</i>	<i>Unsat.</i>
Inspect fence and barriers surrounding the facility for damage/vandalism.			Inspect for signs of erosion, cracks, and integrity		
Inspect the outside perimeter for indication of unauthorized entry.					
DHWSA 2	Sat	Unsat	CONTAINER MANAGEMENT BUILDING	<i>Sat.</i>	<i>Unsat.</i>
Inspect for signs of damage, leakage or fugitive odors from roll-offs.			Inspect for liquids in secondary containment		
Inspect all containers for proper labels and identification.			Inspect containment structure for cracks, damage or structural defects that could cause failure.		
Inspect for signs of spillage on pad.			Ensure stored containers are closed.		
			Ensure proper container labeling and adequate aisle space.		
DHWSA 3	<i>Sat.</i>	<i>Unsat.</i>	Inspect containers for leakage, severe rusting or structural defects.		
Inspect for signs of damage, leakage or fugitive odors from roll-offs.					
Inspect all containers for proper labels and identification.			MAINTENANCE AREA	Sat	Unsat.
Inspect for signs of spillage on pad.			Inspect Empty roll-off bins (waiting for repairs) for residual waste		

Any item which had been determined as "Unsatisfactory" shall be noted in remarks with an explanation and "Corrective Action" to be taken.



APPENDIX A

FACILITY INSPECTION REPORTS

BEATTY

TANKS T-1 TREATMENT PAN I QUARTERLY INSPECTION

DATE (m.d.y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Quarterly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

BATCH STABILIZATION TANK	Satisfactory	Unsatisfactory
Inspect treatment pan for excessive damage that might cause unit failure		
Inspect treatment pan seam welds, for cracks, holes or other damage		
Inspect treatment pan steel panels for warping or other damage		
Inspect treatment pan anodes to insure they are still in place		

Provide a Brief Description of Repair Needed:

Maintenance Employee Name: _____

Date of Repair: _____

Provide Brief Description of Repairs Made:

BEATTY

TANKS T-2/TREATMENT PAN 2 QUARTERLY INSPECTION

DATE (m d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Quarterly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

BATCH STABILIZATION TANK	Satisfactory	Unsatisfactory
Inspect treatment pan for excessive damage that might cause unit failure		
Inspect treatment pan seam welds, for cracks, holes or other damage		
Inspect treatment pan steal panels for warping or other damage		
Inspect treatment pan anodes to insure they are still in place		

Provide a Brief Description of Repair Needed:

Maintenance Employee Name: _____

Date of Repair: _____

Provide Brief Description of Repairs Made:

BEATTY

TANKS T-3 TREATMENT PAN 3 QUARTERLY INSPECTION

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Quarterly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

BATCH STABILIZATION TANK	Satisfactory	Unsatisfactory
Inspect treatment pan for excessive damage that might cause unit failure		
Inspect treatment pan seam welds, for cracks, holes or other damage		
Inspect treatment pan steal panels for warping or other damage		
Inspect treatment pan anodes to insure they are still in place		

Provide a Brief Description of Repair Needed:

Maintenance Employee Name: _____

Date of Repair: _____

Provide Brief Description of Repairs Made:

BEATTY

TANKS T-18/TREATMENT PAN 4 QUARTERLY INSPECTION

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Quarterly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

BATCH STABILIZATION TANK	Satisfactory	Unsatisfactory
Inspect treatment pan for excessive damage that might cause unit failure		
Inspect treatment pan seam welds, for cracks, holes or other damage		
Inspect treatment pan steal panels for warping or other damage		
Inspect treatment pan anodes to insure they are still in place		

Provide a Brief Description of Repair Needed:

Maintenance Employee Name: _____

Date of Repair: _____

Provide Brief Description of Repairs Made:

BEATTY

TANKS T-19 TREATMENT PAN 5 QUARTERLY INSPECTION

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Quarterly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

BATCH STABILIZATION TANK	Satisfactory	Unsatisfactory
Inspect treatment pan for excessive damage that might cause unit failure		
Inspect treatment pan seam welds, for cracks, holes or other damage		
Inspect treatment pan steel panels for warping or other damage		
Inspect treatment pan anodes to insure they are still in place		

Provide a Brief Description of Repair Needed:

Maintenance Employee Name: _____

Date of Repair: _____

Provide Brief Description of Repairs Made:
